

FILED

Apr 29 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION
13
14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 v.
17 KIMBERLY CARRASCO,
18 Defendant.

Case No.: CR 20-0458 BLF (NC)

**STIPULATION AND ORDER TO
MODIFY CONDITIONS OF RELEASE
RE: TRAVEL**

20 IT IS HEREBY STIPULATED AND AGREED between the government through its attorney,
21 Alexandra Shepard, and defendant Kimberly Carrasco through her attorney, Severa Keith, that the
22 Conditions of Pretrial Release and Appearance, ordered on February 2, 2021, be modified to permit
23 the Pretrial Services Officer to allow Ms. Carrasco to drive from her home in San Jose, California to
24 Los Angeles, California, on April 29, 2021 for the purpose of visiting a sick relative and to visit
25 family. Ms. Carrasco will return to San Jose, California by May 3, 2021.
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1 Pretrial Services does not object to this travel. Ms. Carrasco is currently in compliance with
2 her conditions of release.

3 18 U.S.C section 42(c)(3) states, “[t]he judicial officer may at any time amend the order to
4 impose additional or different conditions of release.” 18 U.S.C § 31452(c)(3).

5 As such, the parties request that the Court exercise its authority to modify the Conditions of
6 Release and Appearance, as stipulated.

7 IT IS SO STIPULATED.

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9 Dated: April 29, 2021

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11 GEOFFREY HANSEN
12 Acting Federal Public Defender
13 Northern District of California

14

15 /S/
16 SEVERA KEITH
17 Assistant Federal Public Defender

18

19 Dated: April 29, 2021

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21 STEPHANIE HINDS
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26 ALEXANDRA SHEPARD
27 Assistant United States Attorney

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10 UNITED STATES OF AMERICA,

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15 Case No.: CR 20-0458 BLF (NC)

16
17 **ORDER TO MODIFY CONDITIONS OF**
RELEASE RE: TRAVEL

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19
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21 ORDER

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23 GOOD CAUSE HAVING BEEN SHOWN, the Court orders, for the reasons set forth in the
24 parties' Stipulation, that the Conditions of Pretrial Release and Appearance be modified such that
25 Pretrial Services may permit defendant Kimberly Carrasco to travel from San Jose, California to Los
Angeles, California, from April 29, 2021 through May 3, 2021, and returning to San Jose, California
no later than May 3, 2021.

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27 IT IS SO ORDERED.

28 Dated: April 29, 2021

